

EXHIBIT B

ROBERT G. BARRILLEAUX & ASSOCIATES, INC.

1206 J. W. DAVIS SR. DRIVE
SUITE 101
HAMMOND, LOUISIANA 70403
(504) 542-0391
FAX (504) 542-6516

ROBERT G. BARRILLEAUX, C.E. & L.S.
March 3, 1995

MARK T. CHEMAY, L.S.

A. B. Cruz, III
Gardner, Carton & Douglas
1301 K. Street, N.W.
Suite 900, East Tower
Washington, D.C. 20005

Re: Description of surveying
techniques and degree of
accuracy

Dear Mr. Cruz:

As per your request, I would make a statement regarding the above subject matters as they pertain to tower location as follows:

1. Techniques:

Most boundary surveyors today use electronic total stations which are capable of extreme accuracy in angular and distance measurements as well as determination of relative elevations. In addition most boundary surveyors keep for reference and location a series of U.S. Geological Survey Quadrangle Maps of their service area. These maps are produced from aerial photographs keyed to ground control points located by actual ground surveys both horizontal and vertical. On the 7 1/2 minute series "quad" map one second of longitude in our area is approximately 87.37 feet. Using ground control points that are located on the "quad" map a surveyor can utilize surveying equipment to determine the location of a tower relative to the aforementioned ground control points, both horizontal and vertical.

2. Accuracy:

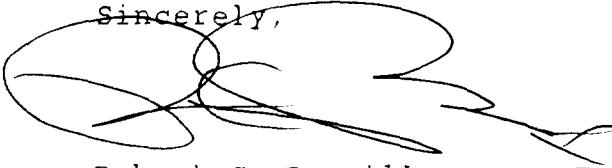
The total station surveying instruments are capable of an accuracy greater than 1/10,000 or a maximum error of .0001 ft/ft. Therefore, the limiting factor for accuracy is the "quad" map which has a normal horizontal accuracy of $\pm 1/2$ second of arc, or 43.88 feet, at 30 degrees North latitude. The vertical accuracy of the "quad" maps has historically been $\pm 1.0'$. Therefore, it is safe to assume an accuracy of ± 43.88 feet horizontally and $\pm 1.0'$ vertically for a given location.

The cost for a tower location utilizing the foregoing methodology has historically varied from \$150.00 to \$300.00 depending on location and accessibility.

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March 3, 1995
A. B. Cruz, III

If you should have any questions relating to this matter please
do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert G. Barrilleaux', with a large, stylized circular flourish at the beginning.

Robert G. Barrilleaux, C.E., E.E., P.L.S.

CERTIFICATE OF SERVICE

I, Kimberly A. Moats, a secretary in the law firm of Gardner, Carton & Douglas, certify that I have this 21st day of March, 1995, caused to be sent by first-class U.S. mail, postage-prepaid, a copy of the foregoing Comments of Kelley Communications, Inc. the following parties:

Chairman Reed E. Hundt*
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, D.C. 20554

Commissioner James H. Quello*
Federal Communications Commission
1919 M Street, N.W.
Room 802
Washington, D.C. 20554

Commissioner Andrew C. Barrett*
Federal Communications Commission
1919 M Street, N.W.
Room 826
Washington, D.C. 20554

Commissioner Rachelle B. Chong*
Federal Communications Commission
1919 M Street, N.W.
Room 844
Washington, D.C. 20554

Commissioner Susan Ness*
Federal Communications Commission
1919 M Street, N.W.
Room 832
Washington, D.C. 20554

Ms. Regina Keeney*
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W.
Room 5002
Washington, D.C. 20554

Mr. Ralph A. Haller*
Deputy Chief, Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W.
Room 5002
Washington, D.C. 20554

Mr. Gary L. Stanford
Licensing Division
Wireless Telecommunications Bureau
Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA 17325

Mr. W. Riley Hollingsworth
Licensing Division
Wireless Telecommunications Bureau
Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA 17325

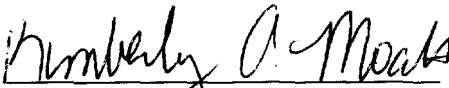
Mr. William H. Kellett
Licensing Division
Wireless Telecommunications Bureau
Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA 17325

Ms. Anne Marie Wypijewski
Licensing Division
Wireless Telecommunications Bureau
Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA 17325

Magalie Salas
Enforcement Division
Compliance and Information Bureau
Federal Communications Commission
Room 744
1919 M Street, N.W.
Washington, D.C. 20554

Lisa L. Stover
Support Services Branch
Wireless Telecommunications Bureau
Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA 17325

Ms. Nancy Kalinowski
Federal Aviation Administration
Assistant Division Manager
Air Space-Rules & Aeronautical
Information Division
ATP-201
800 Independence Avenue, S.W.
Washington, D.C. 20591


Kimberly A. Moats